

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

NINGDE AMPEREX TECHNOLOGY
LIMITED,

Plaintiff,

v.

ZHUHAI COSMX BATTERY CO., LTD.,

Defendant.

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Civil Action No.: 2:22-CV-232

JURY TRIAL DEMANDED

**JOINT MOTION TO APPOINT TIANLU REDMON AND VIVAN JOSH AS
INTERPRETERS**

Plaintiff Ningde AmpereX Technology Limited (“ATL”) and Defendant Zhuhai CosMX Battery Co., Ltd. (“CosMX”) (collectively, “the Parties”), by and through their counsel, jointly file this motion to appoint Ms. Tianlu Redmon and Ms. Vivan Josh to serve as interpreters for the upcoming trial.

To reduce confusion and make efficient use of time, the interpreters will not raise disagreements or disputes regarding their interpretation in front of the jury or with the Court. Instead, Mss. Redmon and Josh will take turns interpreting during trial; and only one interpreter will be interpreting for the record at any given time.

Both Mss. Redmon and Josh are well qualified as Mandarin interpreters. Their CVs are attached as Exhibits 1 and 2 to this Motion. The Parties agree that Mss. Redmon and Josh will not be utilized by either side for trial witness preparation, and agree not to have *ex parte* communications with Mss. Redmon and Josh regarding the substance of this case.

DATED: January 25, 2024

Respectfully submitted,

By: /s/ Michael D. Powell

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Counsel for Defendant Zhuhai CosMX Battery Co., Ltd.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that, on January 25, 2024, all counsel of record for Defendant who are deemed to have consented to electronic service are being served with a copy of this document via email.

/s/ Michael D. Powell

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that counsel for Plaintiff has met and conferred with counsel for Defendant, and both Parties have agreed to the proposed order submitted herewith.

/s/ Michael D. Powell